

# EXHIBIT F

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10 UBER TECHNOLOGIES, INC.;  
RASIER, LLC; and RASIER-CA, LLC

11 [Additional Counsel Listed on Signature Page]

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15  
16 IN RE: UBER TECHNOLOGIES, INC.,  
17 PASSENGER SEXUAL ASSAULT  
LITIGATION

18 This Document Relates to:

19 ALL ACTIONS

20 Case No. 3:23-md-03084-CRB

21 **DEFENDANTS UBER TECHNOLOGIES, INC.,  
RASIER LLC AND RASIER-CA, LLC'S  
SECOND AMENDED RESPONSES TO  
PLAINTIFFS' SECOND SET OF  
INTERROGATORIES**

22 Judge: Hon. Lisa J. Cisneros  
23 Courtroom: G – 15th Floor

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1        2. Responding Party objects to the definitions of “Uber,” “You,” “Your,” and “Yourself”  
2 as vague, ambiguous, overbroad, unduly burdensome, and seeking information that is not relevant to  
3 the claims and defenses in this Action to the extent they refer to “parents, divisions, departments,  
4 subsidiaries, affiliates, predecessors, successors, present or former officers, directors, owners,  
5 members, partners, principals, agents, employees, contractors, subcontractors, administrators,  
6 attorneys, experts, investigators, consultants, joint venturers, licensors, and all other Persons acting or  
7 purporting to act on its behalf.” Responding Party is responding only on behalf of the named  
8 defendants.

9        **OBJECTIONS AND RESPONSES TO SECOND SET OF INTERROGATORIES**

10        **INTERROGATORY NO. 1:**

11        For each month in the year 2017, specify by category, the number of Sexual Violence Incidents  
12 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
13 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
14 Usage Tracking.”

15        **RESPONSE NO. 1:**

16        Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
17 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
18 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
19 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
20 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
21 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
22 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
23 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
24 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
25 Responding Party is responding only on behalf of the named defendants. Subject to and without  
26 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
27 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
28

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1 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental  
 2 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

3 **INTERROGATORY NO. 2:**

4 For each month in the year 2018, specify by category, the number of Sexual Violence Incidents  
 5 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
 6 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
 7 Usage Tracking.”

8 **RESPONSE NO. 2:**

9 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
 10 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
 11 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
 12 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
 13 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
 14 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
 15 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
 16 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
 17 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
 18 Responding Party is responding only on behalf of the named defendants. Subject to and without  
 19 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
 20 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
 21 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental  
 22 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

23 **INTERROGATORY NO. 3:**

24 For each month in the year 2019, specify by category, the number of Sexual Violence Incidents  
 25 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
 26 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
 27 Usage Tracking.”

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1 **RESPONSE NO. 3:**

2 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
3 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
4 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
5 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
6 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
7 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
8 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
9 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
10 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
11 Responding Party is responding only on behalf of the named defendants. Subject to and without  
12 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
13 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
14 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental  
15 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

16 **INTERROGATORY NO. 4:**

17 For each month in the year 2020, specify by category, the number of Sexual Violence Incidents  
18 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
19 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
20 Usage Tracking.”

21 **RESPONSE NO. 4:**

22 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
23 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
24 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
25 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
26 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
27 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,

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1 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
2 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
3 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
4 Responding Party is responding only on behalf of the named defendants. Subject to and without  
5 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
6 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
7 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental  
8 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

9 **INTERROGATORY NO. 5:**

10 For each month in the year 2021, specify by category, the number of Sexual Violence Incidents  
11 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
12 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
13 Usage Tracking.”

14 **RESPONSE NO. 5:**

15 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
16 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
17 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
18 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
19 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
20 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
21 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
22 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
23 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”

24 Responding Party is responding only on behalf of the named defendants. Subject to and without  
25 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
26 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
27 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental

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1 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

2 **INTERROGATORY NO. 6:**

3 For each month in the year 2022, specify by category, the number of Sexual Violence Incidents  
4 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
5 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
6 Usage Tracking.”

7 **RESPONSE NO. 6:**

8 Responding Party objects to this Interrogatory as unduly burdensome and harassing in that it  
9 seeks to compel the creation of new analyses and documents that do not exist. Responding Party  
10 further objects to the definition of the term “Sexual Violence Incident” as argumentative and  
11 confusing. Responding Party also objects to the definition of the term “YOU” as vague, ambiguous,  
12 overbroad, unduly burdensome, and seeking information that is not relevant to the claims and defenses  
13 in this Action to the extent they refer to “parents, divisions, departments, subsidiaries, affiliates,  
14 predecessors, successors, present or former officers, directors, owners, members, partners, principals,  
15 agents, employees, contractors, subcontractors, administrators, attorneys, experts, investigators,  
16 consultants, joint venturers, licensors, and all other Persons acting or purporting to act on its behalf.”  
17 Responding Party is responding only on behalf of the named defendants. Subject to and without  
18 waiving the foregoing objections, Responding Party responds that it served Plaintiffs with information  
19 responsive to this Interrogatory on April 17 and April 23, 2025 in two documents titled “Information  
20 Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025” and “Supplemental  
21 Information Provided by Defendants Pursuant to the Parties’ Agreement, Dated April 4, 2025.”

22 **INTERROGATORY NO. 7:**

23 For each month in the year 2023, specify by category, the number of Sexual Violence Incidents  
24 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
25 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
26 Usage Tracking.”

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**1 RESPONSE NO. 7:**

2 Responding Party objects to this Interrogatory as unduly burdensome and harassing insofar as it  
3 purports to compel the creation of new analyses and documents that do not exist. Responding Party further  
4 objects to the definition of the term “Sexual Violence Incident” as argumentative and confusing.  
5 Responding Party also objects to the definition of the term “YOU” as vague, ambiguous, overbroad, unduly  
6 burdensome, and seeking information that is not relevant to the claims and defenses in this Action to the  
7 extent they refer to “parents, divisions, departments, subsidiaries, affiliates, predecessors, successors,  
8 present or former officers, directors, owners, members, partners, principals, agents, employees,  
9 contractors, subcontractors, administrators, attorneys, experts, investigators, consultants, joint venturers,  
10 licensors, and all other Persons acting or purporting to act on its behalf.” Party is responding only on behalf  
11 of the named defendants.

12 Subject to and without waiving the foregoing objections, Defendants state [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

**23 INTERROGATORY NO. 8:**

24 For each month in the year 2024, specify by category, the number of Sexual Violence Incidents  
25 in the United States that YOU categorized into each of the 21 categories in Uber’s Sexual Misconduct  
26 and Sexual Violence Taxonomy or categorized as “Insufficient Information” or “Parent Category  
27 Usage Tracking.”

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**1 RESPONSE NO. 8:**

2 Responding Party objects to this Interrogatory as unduly burdensome and harassing insofar as it  
3 purports to compel the creation of new analyses and documents that do not exist. Responding Party further  
4 objects to the definition of the term “Sexual Violence Incident” as argumentative and confusing.  
5 Responding Party also objects to the definition of the term “YOU” as vague, ambiguous, overbroad, unduly  
6 burdensome, and seeking information that is not relevant to the claims and defenses in this Action to the  
7 extent they refer to “parents, divisions, departments, subsidiaries, affiliates, predecessors, successors,  
8 present or former officers, directors, owners, members, partners, principals, agents, employees,  
9 contractors, subcontractors, administrators, attorneys, experts, investigators, consultants, joint venturers,  
10 licensors, and all other Persons acting or purporting to act on its behalf.” Party is responding only on behalf  
11 of the named defendants.

12 Subject to and without waiving the foregoing objections, Defendants state [REDACTED]

13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]

**23 INTERROGATORY NO. 9:**

24 Identify the “200 gender-based violence prevention experts” referenced in the introduction  
25 (page 9) of Uber’s 2017-2018 U.S. Safety Report.

**26 RESPONSE NO. 9:**

27 Responding Party objects to the definition of the term “Uber” as vague, ambiguous, overbroad,